

Honorable James L. Robart

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLESEATTLE METROPOLITANS HOCKEY
LLC, a Washington limited liability company,

Plaintiff / Counterclaim Defendant,

v.

SEATTLE HOCKEY PARTNERS LLC, a
Delaware limited liability company,

Defendant / Counterclaim Plaintiff.

Civil Action No. 23-cv-1989-JLR

STIPULATED MOTION AND
[PROPOSED] ORDER TO EXTEND
TRIAL AND RELATED DATESNOTE ON MOTION CALENDAR:
November 15, 2024**STIPULATION**


Pursuant to the Court's Order (Dkt. 32) regarding modified expert witness disclosure, and further in an effort to manage a large number of fact and expert depositions that otherwise would need to occur during the holiday season, the parties jointly stipulate and respectfully move the Court for an order extending trial and related dates by approximately one month. The parties believe that good cause is shown for this extension for at least the following reasons:

- Additional time is required for damages expert witness disclosure, third-party discovery, as well as scheduling related expert, party and third-party depositions.
- As contemplated in the parties' Joint Status Report (Dkt. 17), the parties expect to have substantially all written discovery complete by December 2025, and have committed

STIPULATED MOTION AND [PROPOSED] ORDER FOR
EXTENSION - 1

Civil Action No. 23-cv-1989JLR

METS-6-0001 P21 StipMotCONT

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to mediation in January 2025, after the holidays and before substantial deposition discovery.

The parties respectfully submit that the discovery issues and commitment to early mediation provide good cause for the requested extension. The proposed new schedule is as follows:

| Action | Current Date | Proposed Date |
|---|--------------|---------------------------|
| 5 DAY JURY TRIAL | May 19, 2025 | Jun 23, 2025 |
| Deadline to conduct mediation | — | Jan 17, 2025 |
| Disclosure of damages expert testimony under FRCP 26(a)(2) | Nov 5, 2024 | Nov 22, 2024 ¹ |
| Disclosure of rebuttal survey expert testimony under FRCP 26(a)(2) | | Dec 5, 2024 |
| Disclosure of rebuttal damages expert testimony under FRCP 26(a)(2) | | Dec 23, 2024 ² |
| All motions related to discovery must be filed by LCR 7(d) | Dec 5, 2024 | Jan 13, 2025 |
| Discovery completed by | Jan 6, 2025 | Feb 17, 2025 |
| All dispositive motions and motions challenging experts must be filed by LCR 7(d) | Feb 3, 2025 | Mar 10, 2025 |
| Settlement conference held no later than | Mar 20, 2025 | Apr 25, 2025 |
| Motions <i>in limine</i> should be filed pursuant to Local Rule CR 7(d)(4) by | Apr 7, 2025 | May 7, 2025 |
| Agreed pretrial order filed with the Court by | Apr 28, 2025 | May 26, 2025 |
| Deposition designations must be submitted in hardcopy to the court (not filed on CM/ECF) by LCR 32(e) | Apr 30, 2025 | May 28, 2025 |
| Pretrial conference will be held at 02:00 PM on | May 5, 2025 | Jun 9, 2025 |
| Trial briefs, proposed <i>voir dire</i> , jury instructions by Motions raised in trial briefs will not be considered | May 12, 2025 | Jun 16, 2025 |

The stipulated extension is not submitted for the purposes of delay, but rather due to litigation and party logistics, and is in the interests of justice and fairness. The parties respectfully request that the Court agree to the stipulated extension of time and issue the proposed order submitted herewith.

¹ Or seven calendar days after receipt of Kraken's complete ordered discovery responses, whichever is later.

² Assuming the opening damages expert report is served Nov 22, 2024. Otherwise, within 30 days of service.

1 RESPECTFULLY SUBMITTED November 15, 2024.

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Attorneys for Defendant

I certify that this memorandum contains

_____ words, in compliance with the Local

Civil Rules.

12 **[PROPOSED] ORDER**

13 Pursuant to the Stipulation of the parties, IT IS SO ORDERED.

14 DATED this ____ day of _____, 2024.

17 _____
18 United States District Judge